

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHIRLEY C. FRITZ,
[DOB: 08/10/1965]

Defendant.

No. _____

COUNT ONE

(Computer Fraud)

18 U.S.C. § 1030(a)(2)(B) and (c)(2)(B)(ii)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

COUNT TWO

(Disclosure of SSN)

42 U.S.C. § 408(a)(8)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

COUNT THREE

(Aggravated Identity Theft)

18 U.S.C. § 1028A

NLT 2 Years Imprisonment (mandatory
consecutive to any other count)

NMT \$250,000 Fine

NMT 1 Years Supervised Release

Class E Felony

\$100 Mandatory Special Assessment Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

At all times material and relevant to this Indictment:

INTRODUCTION AND BACKGROUND

1. The Social Security Administration (SSA) was an agency of the United States within the United States government. SSA administered programs under the Social Security Act, Title 42, United States Code, Sections 301–1397.

2. The defendant, SHIRLEY C. FRITZ, was an employee of SSA and, per written agency policy, had the responsibility to protect Personally Identifiable Information, to maintain appropriate security controls, and to report the loss or suspected loss of Personally Identifiable Information.

COUNT ONE
(Computer Fraud)

3. The factual allegations contained in paragraphs one and two of this indictment are re-alleged and incorporated by reference.

4. On or about January 3, 2019, in the Western District of Missouri, the defendant, SHIRLEY C. FRITZ, did intentionally exceed authorized access to a computer, and thereby obtained information from a department and agency of the United States, and the offense was committed in furtherance of a criminal act in violation of the laws of the United States, specifically, 42 U.S.C. 408(a)(8) and 18 U.S.C. 1028A.

The above was in violation of Title 18, United States Code, Section 1030(a)(2) and (c)(2)(B)(ii).

COUNT TWO
(Disclosure of Social Security Number)

5. The factual allegations contained in paragraphs one and two of this indictment are re-alleged and incorporated by reference.

6. On or about November 21, 2019, within the Western District of Missouri, the defendant, SHIRLEY C. FRITZ, did disclose, use, or compel the disclosure of the social security number of a person in violation of the law of the United States.

The above was in violation of Title 42, United States Code, Section 408(a)(8).

COUNT THREE
(Aggravated Identity Theft)

7. The factual allegations contained in paragraphs one and two of this indictment are re-alleged and incorporated by reference.

8. On or about November 21, 2019, within the Western District of Missouri, the defendant, SHIRLEY C. FRITZ, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code 1028A(c), to wit, disclosure of a social security number, in violation of 42 U.S.C. 408(a)(8), as charged in Count 2, knowing that the means of identification belonged to another actual person.

The above was in violation of Title 18, United States Code, Section 1028A.

A TRUE BILL.

/s/ Sean Saunders
FOREPERSON OF THE GRAND JURY

/s/ Courtney R. Pratten
Courtney R. Pratten
Special Assistant United States Attorney

Dated: 1/26/2021
Kansas City, Missouri